Victoria Giampa 1848 Wellington Court Henderson, NV 89014 (702 434-9027 superjanedoe@yahoo.com Plaintiff in Pro Se

VICTORIA GIAMPA,

100 inclusive, et al.

Defendants.

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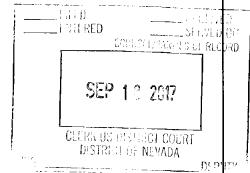
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## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

Plaintiff,
vs.

MIDFIRST BANK; FANNIE MAE, FANNIE MAE AS
TRUSTEE FOR SECURITIZED TRUST, FANNIE MAE
REMIC PASS-THROUGH CERTIFICATES 2006-123
TRUST; COUNTRYWIDE SERVICING CORP., BANK
OF AMERICA CORPORATION; BANK OF
AMERICA, N.A., BAC HOME LOANS SERVICING,
LP; RECONTRUST COMPANY, N.A.; GREEN TREE
SERVICING, LLC; DITECH FINANCIAL, LLC;
MORTGAGE ELECTRONIC REGISTRATION
SYSTEM, ("MERS"); NATIONAL DEFAULT
SERVICING CORPORATION; and does 1 through

Case No.: 2:17-cv-01208-MMJD-CWH

PLAINTIFF'S APPLICATION FOR ENTRY OF DEFAULT AGAINST DEFENDANT NATIONAL DEFAULT SERVICING

To the Clerk of the United States District Court for the District of Nevada:

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As provided by Rule 55 of the Federal Rules of Civil Procedure, Plaintiff Victoria Giampa respectfully requests that the Clerk of the Court enter a default against Defendant National Default Servicing for failure to plead or otherwise defend against this action in a timely matter.

As evidenced by the proof of service on file with this Court, Defendant National Default Servicing was served pursuant to Rule 4 of the Federal Rules of Civil Procedure on August 10, 2017.

The time limit for Defendant National Default Servicing to appear or otherwise respond to Plaintiff's Verified Complaint expired on August 30, 2017.

Defendant National Default Servicing has failed to plead or otherwise respond to Plaintiff's Verified Complaint filed on April 28, 2017.

Plaintiff seeks a default from the Clerk of this Court as further explained in the attached Declaration.

Dated: September 18, 2017

Respectfully submitted,

Giampa

Victoria Giampa

## DECLARATION OF PLAINTIFF VICTORIA GIAMPA

- I am the Plaintiff in this action, and I am familiar with the pleadings in this matter.
   I submit this declaration in support of Plaintiff's Application for Entry of Default Against
   Defendant National Default Servicing. If called as a witness, I could and would competently testify.
- Defendant National Default Servicing was served pursuant to Rule 4 of the
   Federal Rules of Civil Procedure on August 10, 2017, as evidenced by the proof of service docketed on this same date.
- 3. Under Rule 12, Defendant National Default Servicing was required to plead or otherwise respond to Plaintiff's Verified Complaint by August 30, 2017. The time to plead or otherwise respond to Plaintiff's Verified Complaint has not been extended by any agreement of the parties or any order of this Court.
- 4. Plaintiff respectfully requests this court to take judicial notice of the Clerk's Entry of Summons Issued, Docket #10, on August 10, 2017, as to Defendant National Default Servicing Corporation.

I declare under penalty of perjury that the foregoing is true and correct.

Victoria Giampa

Giampa

Plaintiff In Pro Se

**CERTIFICATE OF SERVICE** 1 2 I hereby certify that on September 18, 2017, a true and correct copy of the foregoing was 3 served by U.S. Mail, first-class postage prepaid, to the following Parties to this action: 4 5 Darren T. Brenner Akerman LLP 6 1160 Town Center Drive, Suite 330 Las Vegas, NV 89144 7 702-634-5000 8 Fax: 702-380-8572 Darren.brenner@akerman.com 9 10 Attorney for Defendants Bank of America, N.A.; Countrywide Servicing Corp.; Bank of America Corporation; BAC Home Loans Servicing; Recontrust Company, N.A; Fannie Mae, 11 Fannie Mae as Trustee For Securitized Trust; Fannie Mae Remic Pass-Through Certificates 12 2006-123 Trust 13 Brigette E. Foley Wolfe & Wyman LLP 14 6757 Spencer Street 15 Las Vegas, NV 89119 702-476-0100 16 Fax: 702-476-0101 17 Email: befoley@wolfewyman.com 18 Attorney for Defendants Green Tree Servicing, LLC; Ditech Financial LLC, and Mortgage 19 Electronic Registration System ("MERS") 20 Tiffany & Bosco, P.A. 21 212 South Jones Blvd. Las Vegas, NV 89107 22 23 Attorney for Defendant National Default Servicing Corporation 24 Dated this 18th day of September 2017. 25 26 27 28 Plaintiff In Pro Se